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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

v.

JALIL HOLMES,  
a/k/a "Broadday,"  
a/k/a "BD," and  
JAKEEM GIBSON-MADISON,  
a/k/a "Beanz"

:  
: **CRIMINAL COMPLAINT**  
:  
: Hon. Mark Falk  
:  
: Mag. No. 19-3661  
:  
:  
:

I, Alexandra Skovira, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

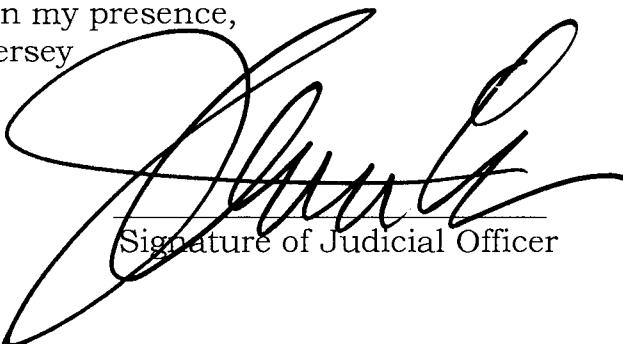
**SEE ATTACHMENT B**

  
Alexandra Skovira, Special Agent

Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
May 17, 2019, Essex County, New Jersey

Honorable Mark Falk  
United States Magistrate Judge

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Violent Crime in Aid of Racketeering Activity – Assault  
with a Dangerous Weapon)

On or about January 9, 2019, in the District of New Jersey and elsewhere,  
the defendants,

**JALIL HOLMES,**  
a/k/a “Broadday,”  
a/k/a “BD,” and  
**JAKEEM GIBSON-MADISON,**  
a/k/a “Beanz,”

for the purpose of gaining entrance to, and maintaining and increasing position  
in, the Marion Gardens Enterprise, an enterprise engaged in racketeering  
activity, did knowingly and purposely assault Victim One with a dangerous  
weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

In violation of Title 18, United States Code, Section 1959(a)(3), and Title  
18, United States Code, Section 2.

**COUNT TWO**

(Violent Crime in Aid of Racketeering Activity – Assault  
with a Dangerous Weapon)

On or about January 9, 2019, in the District of New Jersey and elsewhere,  
the defendants,

**JALIL HOLMES,**  
a/k/a “Broadday,”  
a/k/a “BD,” and  
**JAKEEM GIBSON-MADISON,**  
a/k/a “Beanz,”

for the purpose of gaining entrance to, and maintaining and increasing position  
in, the Marion Gardens Enterprise, an enterprise engaged in racketeering  
activity, did knowingly and purposely assault Victim Two with a dangerous  
weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

In violation of Title 18, United States Code, Section 1959(a)(3), and Title  
18, United States Code, Section 2.

**COUNT THREE**

(Violent Crime in Aid of Racketeering Activity – Assault  
with a Dangerous Weapon)

On or about January 9, 2019, in the District of New Jersey and elsewhere,  
the defendants,

**JALIL HOLMES,**  
a/k/a “Broadday,”  
a/k/a “BD,” and  
**JAKEEM GIBSON-MADISON,**  
a/k/a “Beanz,”

for the purpose of gaining entrance to, and maintaining and increasing position  
in, the Marion Gardens Enterprise, an enterprise engaged in racketeering  
activity, did knowingly and purposely assault Victim Three with a dangerous  
weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

In violation of Title 18, United States Code, Section 1959(a)(3), and Title  
18, United States Code, Section 2.

**COUNT FOUR**

(Discharge of a Firearm During a Crime of Violence)

On or about January 9, 2019, in the District of New Jersey and elsewhere,  
the defendants,

**JALIL HOLMES,**  
a/k/a "Broadday,"  
a/k/a "BD," and  
**JAKEEM GIBSON-MADISON,**  
a/k/a "Beanz,"

during and in relation to a crime of violence for which each may be prosecuted  
in a court of the United States—specifically, the assault with a dangerous  
weapon in aid of racketeering activity charged in Count One of this Complaint—  
did knowingly use and carry a firearm, which was discharged.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii), and  
Title 18, United States Code, Section 2.

**COUNT FIVE**

(Discharge of a Firearm During a Crime of Violence)

On or about January 9, 2019, in the District of New Jersey and elsewhere,  
the defendants,

**JALIL HOLMES,**  
a/k/a "Broadday,"  
a/k/a "BD," and  
**JAKEEM GIBSON-MADISON,**  
a/k/a "Beanz,"

during and in relation to a crime of violence for which each may be prosecuted  
in a court of the United States—specifically, the assault with a dangerous  
weapon in aid of racketeering activity charged in Count Two of this Complaint—  
did knowingly use and carry a firearm, which was discharged.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii), and  
Title 18, United States Code, Section 2.

**COUNT SIX**

(Discharge of a Firearm During a Crime of Violence)

On or about January 9, 2019, in the District of New Jersey and elsewhere,  
the defendants,

**JALIL HOLMES,**  
a/k/a "Broadday,"  
a/k/a "BD," and  
**JAKEEM GIBSON-MADISON,**  
a/k/a "Beanz,"

during and in relation to a crime of violence for which each may be prosecuted  
in a court of the United States—specifically, the assault with a dangerous  
weapon in aid of racketeering activity charged in Count Three of this Complaint—  
did knowingly use and carry a firearm, which was discharged.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii), and  
Title 18, United States Code, Section 2.

**ATTACHMENT B**

I, Alexandra Skovira, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs, and other items of evidence. The information set forth herein contains information obtained from investigators and other law enforcement officers who have interviewed numerous witnesses and sources, listened to hundreds of hours of communications, and reviewed numerous social media posts. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

**The Enterprise**

1. At all times relevant to this Complaint, defendants JALIL HOLMES, a/k/a "Broadday," a/k/a "BD," JAKEEM GIBSON-MADISON, a/k/a "Beanz," and others, known and unknown, were members of a criminal organization known as the Marion Gardens street gang, also known as the "300" gang (hereinafter the "Marion Gardens Enterprise" or "the Enterprise"). The Marion Gardens Enterprise is a criminal street gang comprised primarily of members of the "Brim" and "Sex, Money, Murder" subsets of the Bloods street gang who reside in and around the Marion Gardens Housing Complex located in Jersey City, New Jersey ("Marion Gardens"). While associated with the Bloods street gang, members of the Marion Gardens Enterprise represent, first and foremost, the Marion Gardens Housing Complex. The Marion Gardens Enterprise is known for drug distribution in and around the area of the Marion Gardens Housing Complex as well as for violence against numerous rival groups within and around Jersey City, New Jersey. They utilize the symbol "300" and a hand sign, which displays their pinky, ring, and middle fingers, with their thumb and pointer finger closed together in a circle.

2. The Marion Gardens Enterprise, including its leadership, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2)—namely, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At all times relevant to this Complaint, the Marion Gardens Enterprise, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1)—namely,

- a. acts involving murder, in violation of N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), and 2C:5-2; and
- b. multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communication facility to violate the Controlled Substances Act).

**Purposes of the Enterprise**

4. The purposes of the Enterprise included, but were not limited to, the following:

- a. Enriching the members and associates of the Enterprise through criminal activity, including drug trafficking;
- b. Promoting and enhancing the prestige, reputation, and position of the Enterprise with respect to rival criminal organizations;
- c. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise, both in and out of prison, through the use of acts in violation of the laws of the United States and the State of New Jersey, which involved intimidation, threats of violence, and acts of violence, including murder, attempted murder, and assault against, among others, members of rival organizations;
- d. Keeping victims and rivals in fear of the Enterprise and its members and associates; and
- e. Concealing the activities of the Enterprise from law enforcement.

**Members of the Enterprise**

5. Defendant JALIL HOLMES, a/k/a "Broadday," a/k/a "BD" ("HOLMES"), is a member of the Marion Gardens Enterprise. He has a tattoo of "300" across his neck to pay homage to the Marion Gardens Enterprise, and his Facebook handle is "broadday\_II300"—a compilation of his street name and his gang. In addition, Holmes has posted a photo with two other members of the Marion Gardens Enterprise accompanied by the text "Touch One Of Them Just Kno It Come With a Headshot," indicating that members of the Marion Gardens Enterprise retaliate on behalf of other members.

6. Defendant JAKEEM GIBSON-MADISON, a/k/a “Beanz” (“GIBSON-MADISON”) is a member of the Marion Gardens Enterprise. GIBSON-MADISON has appeared in photographs with other members of the Marion Gardens Enterprise, while displaying gang-signs associated with the Enterprise.

7. Rondell Rush, a/k/a “Mr. 300” (“Rush”) was a member of the Marion Garden Enterprise who was murdered by rival gang members in or around February 2016.

8. Judane Holmes, a/k/a “Draco” (“Judane”) was a member of the Marion Garden Enterprise who was shot at several times and ultimately murdered by rival gang members on or about December 26, 2018.

#### **Means and Methods of the Enterprise**

9. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the Enterprise were the following:

- a. Members of the Enterprise and their associates committed, attempted, and threatened to commit acts of violence, including murder and assault, to protect and expand the Enterprise’s criminal operations;
- b. Members of the Enterprise were expected to carry or have immediate access to firearms in order to protect themselves, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the Enterprise;
- c. Participation in criminal activity by a member, particularly violent acts directed at rivals or as directed by the Enterprise’s leadership, increased the respect accorded to that member, and resulted in that member’s maintaining and increasing status in the Enterprise;
- d. Members of the Enterprise and their associates promoted a climate of fear through violence and threats of violence;
- e. Members of the Enterprise and their associates used and threatened to use physical violence against various individuals, including witnesses, informants, and members of rival criminal organizations; and
- f. Members of the Enterprise and their associates trafficked heroin and cocaine base as a means of enriching themselves.

### **The Feud with the Nuski Gang**

10. Beginning at least as early as in or around February 2016, members of the Marion Gardens Enterprise began a series of retaliatory exchanges with a rival group of individuals known as the “Nuski” gang, which operated in the area of Wilkinson Avenue in Jersey City, New Jersey (the “Nuski Gang”).

11. The feud between the Nuski Gang and the Marion Gardens Enterprise escalated in or around April 2016 when a member of the Nuski Gang fatally shot Rush, a member of the Marion Gardens Enterprise. Since the murder of Rush, numerous retaliatory shootings have occurred. One such shooting was the murder of a leader of the Nuski Gang who went by the street name “Nuski,” by a member of the Marion Gardens Enterprise in or around August 2016.

### **The Murder of Judane**

12. On or about December 7, 2018 and on or about December 10, 2018, Judane—a member of the Marion Gardens Enterprise—was the target of two attempted shootings in the area of Martin Luther King Drive in Jersey City, New Jersey. Ultimately, on or about December 26, 2018, Judane was fatally shot in a nearby location on Martin Luther King Drive.

13. Ballistics from the December 26, 2018, homicide matched the shell casings recovered from the December 7, 2018 attempted shooting of Judane. In addition, an individual arrested for the December 10, 2018, attempted murder, who is associated with the Nuski Gang, stated to law enforcement that Judane was targeted due to his association with the Marion Gardens Enterprise as a result of the ongoing feud between the Marion Gardens Enterprise and the Nuski Gang.

### **The Marion Garden Enterprise Retaliates**

14. On or about January 9, 2019, HOLMES and GIBSON-MADISON learned that an individual associated with the Nuski Gang who they believed had been involved in the murder of Judane was located in the area of Grant Avenue. Shortly after receiving this information, HOLMES and GIBSON-MADISON left the Marion Gardens Housing Complex in an Oldsmobile Aurora, bearing New Jersey registration F35KRW, which was registered to GIBSON-MADISON (the “Oldsmobile”).

15. GIBSON-MADISON drove the Oldsmobile to the area of Claremont Avenue and Ocean Avenue in Jersey City, New Jersey, and parked on Claremont Avenue. At approximately 12:20 p.m., video surveillance showed HOLMES exit the Oldsmobile and proceed on foot toward Grant Avenue, at which time he approached a white BMW 528i, bearing New Jersey registration B66JHG (the “BMW”), which was parked on Grant Avenue.

16. As he approached the BMW, HOLMES retrieved a handgun from his waistband and fired multiple shots into the BMW. Victim One sustained three gunshot wounds to his back, Victim Two sustained two gunshot wounds to his back, and Victim Three was not shot. Victim Three is a known associate of the Nuski Gang.

17. At approximately 12:22 p.m., HOLMES retreated to the Oldsmobile on Claremont Avenue, where GIBSON-MADISON was waiting, and the two men drove away.